

No. PD-1034-20

TO THE COURT OF CRIMINAL APPEALS
OF THE STATE OF TEXAS

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8/13/2021
DEANA WILLIAMSON, CLERK

TERRY MARTIN,

Appellant

v.

THE STATE OF TEXAS,

Appellee

Appeal from Lubbock County, Trial Cause 2019-494,736
No. 07-19-00082-CR

* * * * *

**STATE PROSECUTING ATTORNEY'S
REPLY TO TCDLA/LCDLA AMICUS BRIEF**

* * * * *

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**STATE PROSECUTING ATTORNEY'S
REPLY TO TCDLA/LCDLA AMICUS BRIEF**

* * * * *

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

The issue in this case is whether gang-member unlawful carrying of a weapon (UCW) requires a defendant to be one of the three regularly associating in (or actually committing) crime. The plain language does not require this, and there is not enough of a serious constitutional question to require it either. But this turns on a proper interpretation of the statute—a matter that the State and Amicus (Texas Criminal Defense Lawyer's Association and Lubbock Criminal Defense Lawyer's

Association) do not entirely agree on.

SPA's Interpretation of the statute

Under Amicus's interpretation, three scofflaw members can turn an innocent group into a "criminal street gang." A far more reasonable interpretation would require the gang *as a collective* to regularly associate in crime. Numerous textual hints support this interpretation. The statute designates that there be a single, identifiable entity: a criminal street gang. It requires that entity to have common, unifying elements: signs, symbols, and/or leadership. And it is located in a Title of the Penal Code called "Organized Crime."

Adding the phrase "a group of" to § 71.01(d)'s definition might have made it incrementally clearer that the group—and not just a few individuals—must regularly associate in crime:

"Criminal street gang" means [*a group of*] three or more persons having a common identifying sign or symbol or an identifiable leadership who continuously or regularly associate in the commission of criminal activities.

But this is implicit and the best reading of the statute. It is consistent with this Court's understanding, too:

To prove the "as a member of a criminal street gang" element of the [Engaging in Organized Criminal Activity], the hypothetically correct charge would have additionally required proof that appellant was acting

as a member of a group of “three or more persons having a common identifying sign or symbol or an identifiable leadership who continuously or regularly associate in the commission of criminal activities.”

Zuniga v. State, 551 S.W.3d 729, 735–36 (Tex. Crim. App. 2018).

The persons who make up the criminal street gang must *together* continuously or regularly associate in committing crime, even if each member does not do so on her own. This is where the court of appeals required too much—that each member must herself continuously and regularly associate in crime.¹ *Martin v. State*, No. 07-19-00082-CR, 2020 WL 5790424, *3 (Tex. App.—Amarillo, Sept. 28, 2020) (not designated for publication).

But Amicus’s interpretation requires too little; there is still a requirement of *collective* continuous or regular association in crime. It isn’t enough that a few in the group are law-breakers, even if they think their crime benefits the group of law-abiders. The continuous and regular association in crime must be the gang’s because that is *the* defining characteristic of a “criminal street gang.” TEX. PENAL CODE § 71.01(d). And the requirement of regularity of this collective criminal action helps

¹ The court of appeals was implicitly correct in that just by being a member of a criminal street gang, one is necessarily associating in the commission of crime. But it was error to also require that each individual’s association be continual or regular. And certainly the statute does not require each individual to commit the crimes herself.

ensure that the unilateral actions of a few individuals do not become the group's.²

Because of this, Republicans or Catholics won't inadvertently fall prey to the statute by virtue of their membership in those broader organizations. Even if there were a particular diocese whose leadership regularly met to knowingly move child-molesting priests to new, unsuspecting parishes, at most, it would be the members of this criminally associating subset that would be members of a criminal street gang.³ *See* TEX. FAM. CODE §§ 261.101(a) (requiring persons with "cause to believe" to report child abuse); 261.109(a) (misdemeanor to knowingly fail to report abuse). But it would not make all Catholics around the world (or even in the diocese) members of their criminally associating entity. While sorting what activities are the gang's may be difficult in individual cases, a requirement of collective criminal action is nonetheless present in the statute. And certainly if the criminality cannot be

² Although "continuously or regularly" is not defined in the Penal Code, related gang regulation—the statutory provision for nuisance suits to enjoin gang activity—defines the phrase as "at least five times in a period of not more than 12 months." TEX. CIV. PRAC. & REM. CODE § 125.061(2). Regardless of a precise definition, the placement of "regularly" in the company of "continuously," favors the "usual or customary" usage of the word "regular" rather than "recurring at fixed times; periodic." *See* "Regular," WEBSTER'S NEW UNIVERSAL UNABRIDGED DICTIONARY at p. 1209 (1989). In short, criminal association is the criminal street gang's habit.

³ Obviously this would not qualify as engaging in organized criminal activity since failure to report is not a predicate offense. TEX. PENAL CODE § 71.02(a).

said to be the group's as a whole, the group isn't a criminal street gang.

With this understanding of the statute, however, as long as the group as a collective continuously or regularly associates in the committing crime, it is not a requirement that each individual must do so—either for sufficiency or, as explained below, constitutionality.

One's association in a criminal enterprise can be constitutionally regulated.

Amicus's concern about the statute roping in innocents also ignores that it is a *criminal* enterprise that the statute requires membership in. And its criminal nature doesn't come from an arbitrary law enforcement decision to deem a group "criminal"; it comes from § 71.01(d)'s requirement that the group associate in committing legislatively enacted crimes. This makes it entirely constitutional that the State and police should "spurn[]" or "frown up" such groups or find them "irksome," "disfavored" or "objectionable," in Amicus's terminology. The commission of crime and association for that purpose, of course, are not protected by the First Amendment. *See Louisiana ex rel. Gremillion v. Nat'l Ass'n for the Advancement of Colored People*, 366 U.S. 293, 297 (1961) ("criminal conduct . . . cannot have shelter in the First Amendment."). "The freedom of association protected by the First Amendment does not extend to joining with others for the

purpose of depriving third parties of their lawful rights.” *Madsen v. Women’s Health Ctr., Inc.*, 512 U.S. 753, 776 (1994).

While Amicus complains about the criminalization of “mere membership in an organization” and guilt by association, there is no wholesale prohibition against punishment based on one’s relationship to criminal activity. *Scales v. United States*, which Amicus relies on, requires only “that [the] relationship must be sufficiently substantial to satisfy the concept of personal guilt in order to withstand attack under the Due Process Clause of the Fifth Amendment.” 367 U.S. 203, 224-25 (1961). Blackletter law often imputes criminal liability based on one’s relation to others in a criminal enterprise. *See Ex parte Thompson*, 179 S.W.3d 549, 561 (Tex. Crim. App. 2005) (“[Penal Code] § 7.02(b) unambiguously imposes vicarious liability on all members of a conspiracy for the crime committed by one of its members, if certain conditions are met.”).

Affirmatively deciding to join a criminal enterprise and subsequently being embraced as a member by that criminal enterprise necessarily creates the kind of substantial relationship to criminal activity that satisfies Due Process. Membership should put the member on notice that he is facilitating the criminal activities of the gang. *See Casbah, Inc. v. Thone*, 651 F.2d 551, 561 (8th Cir. 1981) (upholding

constitutionality of delivery of drug paraphernalia under circumstances where one reasonably should know that the items will be used with drugs since in context, “it is not constitutionally improper that the seller be required to open his eyes to the objective realities of the sale.”). Moreover, a gang member cannot absolve himself of responsibility by claiming he promotes only the legitimate aims of a dual-purpose organization, if criminal street gangs indeed have such dual purposes. “Money is fungible,” and so is support; where a defendant aids a terrorist organization’s lawful aims, he aids its illicit ones, too. *See Holder v. Humanitarian Law Project*, 561 U.S. 1, 31 (2010).

Membership in an organization that, as a collective, customarily associates in the commission of crime is not the same thing as criminalizing any participation in a meeting of an organization that, outside of the meeting, advocates for violence as a means to a political end, as in *De Jonge v. Oregon*, 299 U.S. 353 (1937). The connection to criminality is of an entirely different degree, and so *De Jonge* provides no reason to strike the statute in this case.

Also, membership cases, like *Scales*, which Amicus also relies on, do not put the constitutionality of this statute in serious doubt. 367 U.S. at 207. *Scales*’s conviction, after all, was upheld. This was so because his conviction rested on

purposeful complicity in the Communist Party's unlawful advocacy. *Id.* at 223. Purposeful complicity in crime is baked-in-the-cake with membership in a criminal street gang. Even if it is not, as mentioned in the State's opening brief, interpreting the statute to require a *mens rea* of knowledge of the criminal street gang's criminality would satisfy any constitutional concerns. *See* State's Brief on the Merits at 23-24. This is because knowing complicity in, and support for, imminent lawless action can be constitutionally prohibited. *See Brandenburg v. Ohio*, 395 U.S. 444, 447 (1969) (recognizing, while overturning K.K.K. leader's conviction, that advocacy is unprotected if "directed to inciting or producing imminent lawless action and is likely to incite or produce such action").

When a group's habit is association in crime, the timeframe for lawless action is not just an eventuality, as with a Communist Party advocate's aims of one-day violent overthrow of the government. Not only that, regularly associating criminal enterprises lack an important potential offset to unlawful action that the Communist Party cases had—a credible claim to mere social or political advocacy. *See Stewart v. McCoy*, 537 U.S. 993, 993 (2002) (Stevens, J., statement on denial of certiorari) ("Long range planning of criminal enterprises—which may include oral advice, training exercises, and perhaps the preparation of written materials—involves

speech that should not be glibly characterized as mere ‘advocacy’ and certainly may create significant public danger” to justify its regulation).

For these reasons, some impairment of the freedoms of criminal street gang members merely because of their membership will be constitutionally justified. Indeed, if this were not the case, the offense of Engaging in Organized Criminal Activity as a member of a criminal street gang would constitute an unconstitutional enhancement. *See Zuniga*, 551 S.W.3d at 735 (requiring no intent to establish, maintain, or participate for criminal street gang members to be guilty of engaging in organized criminal activity).

Specific to the issue at hand, gang-member UCW does not impose guilt by one’s loose association to the crimes of others. It imposes a handgun restriction based on an eyes-wide-open decision to join up with (and thereby knowingly facilitate) a criminal enterprise. It is thus constitutional under the due process clause.

There is no unconstitutional First Amendment burden.

The right to association has been recognized in two contexts: (1) certain intimate human relationships, and (2) a derivative right to associate for the purpose of engaging in express First Amendment activities. *Roberts v. U.S. Jaycees*, 468 U.S. 609, 617 (1984). Within this narrow scope, there are few, if any, associational rights

among criminal street gang members. *See City of Chicago v. Morales*, 527 U.S. 41, 53 (1999) (plurality op.) (ordinance limiting social contact between gang members and others held unconstitutionally vague but did *not* “impair the First Amendment ‘right of association’ that [Supreme Court] cases have recognized.”).

Even to the extent expressive associational rights among gang members exist, they are not absolute. A defendant can be punished more harshly because of his gang membership—consistent with his right to freedom of expression and expressive association—if evidence shows future dangerousness or something other than the group’s mere abstract beliefs. *Davis v. State*, 329 S.W.3d 798, 805 (Tex. Crim. App. 2010) (citing *Mason v. State*, 905 S.W.2d 570, 576 (Tex. Crim. App. 1995) and *Dawson v. Delaware*, 503 U.S. 159, 163-67 (1992)). And it isn’t dependent on specific proof of the *defendant’s* intent to further the group’s illegal agenda. *See Mason*, 905 S.W.2d at 576-77 (rejecting defendant’s complaint that evidence failed to show he subscribed to tenets of the Aryan Brotherhood or Aryan Nation).

Also, contrary to Amicus’s assertions, gang-member UCW is not a content-based regulation of speech. Handgun possession in vehicles is what is regulated; regulation of the expressions of gang membership is only incidental. Moreover, even a no-gang-signs-or-gang-clothing injunction was held to be a narrowly tailored

regulation justified by the compelling state interest in preventing gang crimes. *See Martinez v. State*, 323 S.W.3d 493, 506 (Tex. Crim. App. 2010).

The State's interest here in combatting drive-by shootings by criminal street gangs would more than justify a regulation limiting the transportation of guns in vehicles by criminal street gang members. *See Ex parte Flores*, 483 S.W.3d 632, 641 (Tex. App.—Houston [14th Dist.] 2015, pet. ref'd) (holding that intermediate scrutiny applied to gang-member UCW statute and noting that Flores was not contesting its constitutionality under that standard); *Ex parte Lee*, 617 S.W.3d 154, 162 (Tex. App.—Houston [1st Dist.] 2020, pet. ref'd) (following *Ex parte Flores*). Under rational basis or strict or exacting scrutiny, the statute would pass constitutional muster.

For the same reasons, a defendant in Appellant's situation would fail in his burden to establish an overbreadth claim. To the extent the statute reaches any unconstitutional applications, these pale in comparison to the statute's legitimate and constitutional sweep. *See State v. Manzanares*, 272 P.3d 382, 425-26 (Idaho 2012) (rejecting overbreadth claim involving gang recruitment statute that required knowledge, but not specific intent to further criminal gang's illicit purpose).

The statute is not unconstitutionally vague.

The statute's "criminal street gang" definition does not permit law enforcement to pick and choose who are criminal street gang members. While Amicus compares the Texas Penal Code definition to the statute at issue in *Lanzetta v. New Jersey*, 306 U.S. 451 (1939), Amicus overlooks that the *Lanzetta* statute criminalized membership in a "gang" and defined that term as nothing more than a group of two or more persons. There was no tie to criminality or way of distinguishing between which groups might qualify and which would not. The definition in § 71.01 is not comparable.

A different gang-member-statute vagueness case, *City of Chicago v. Morales*, undermines Amicus's assertion of unconstitutionality. 527 U.S. at 57. There, the statute was found unconstitutionally vague for failure to define loitering. The statute criminalized remaining in a place "with no apparent purpose" but failed to articulate what that would objectively look like. *Id.* Important for this case, however, was the suggestion the statute would suffice if it were limited to those reasonably believed to be criminal gang members. *Id.* at 62 (plurality) (statute would "no doubt" be sufficient if limited to loitering that had apparently harmful purpose "or possibly if it only applied to loitering by persons reasonably believed to be criminal gang

members.”); *Id.* at 68 (O’Connor, J., concurring) (agreeing with plurality that statute would avoid vagueness problems by narrowing application to gang members). Given the narrow scope of this statute and a definition requiring that the gang regularly associate in the commission of crime, the UCW statute is not standardless. Nor does it delegate to law enforcement the ability to establish what is the crime.

No Second Amendment or Right to Travel violation.

Contrary to Amicus’s assertions, this statute and the *Aptheker v. Secretary of State* statute—prohibiting Communist-party-member citizens from holding a U.S. passport—are not “meaningfully” indistinguishable. 378 U.S. 500, 510 (1964); Amicus brief at 28. The breadth of the remedy in *Aptheker*—forbidding intercontinental travel for all members regardless of knowledge of or complicity in the party’s desire to establish communist totalitarian dictatorships throughout the world—is not at all comparable to a gun restriction on criminal street gang members while they are in their vehicles. Nor does *Aptheker* establish an absolute right to travel. Vehicular travel, in particular, is a highly regulated endeavor, and constitutionally so. *See Ex parte Tharp*, 935 S.W.2d 157, 159 (Tex. Crim. App. 1996) (“Driving is not a constitutionally protected right, but a privilege. A license to drive an automobile on the streets is ... a privilege subject to reasonable regulations

formulated under the police power in the interest of the welfare and safety of the general public.’”) (quoting *Ex parte Arnold*, 916 S.W.2d 640, 642 (Tex. App.—Austin 1996, no pet.) (ellipsis is *Ex parte Tharp*’s)).

Similarly, the right to bear arms is not unlimited. *District of Columbia v. Heller*, 554 U.S. 570, 635 (2008). *Heller* did nothing to undermine prohibitions on firearm possession by other high-risk groups such as felons and the mentally ill, identifying such measures as “presumptively lawful.” *Id.* at 626 & n.26. Gang membership presents a similar high risk to society. *See Soliz v. State*, 432 S.W.3d 895, 901 (Tex. Crim. App. 2014) (“Gang membership is also evidence of future dangerousness.”). “[M]ost scholars of the Second Amendment agree that the right to bear arms was tied to the concept of a virtuous citizenry and that, accordingly, the government could disarm ‘unvirtuous citizens.’” *United States v. Yancey*, 621 F.3d 681, 683-85 (7th Cir. 2010) (internal citations omitted). While *Heller* recognized a core right to home protection for self-defense, 554 U.S. at 635, there has been no extension of a constitutional right in vehicles. Nor could the Legislature create such a constitutional right by statute, as Amicus suggests. Amicus brief at 28-29. Given the various interests at stake, this gun and vehicular regulation is constitutionally tailored to the risk gang members present to society.

This is still about sufficiency, not every constitutional question under the sun.

The State addressed these claims so this Court would not have to. A sufficiency challenge should not be used to force review of myriad constitutional challenges that were not litigated below. And Amicus cannot assert as applied challenges on Appellant's behalf. *See State ex rel. Lykos v. Fine*, 330 S.W.3d 904, 909 (Tex. Crim. App. 2011) ("it is incumbent upon an accused to show that he was convicted or charged under that portion of the statute the constitutionality of which he questions.") (quoting *Ex parte Usener*, 391 S.W.2d 735, 736 (Tex. Crim. App. 1965)). Even if it could, Appellant could not show—as a longtime member with a former leadership role—the statute operated unconstitutionally as to him. *See Santikos v. State*, 836 S.W.2d 631, 633 (Tex. Crim. App. 1992) (if there is no constitutional defect in the application of the statute as to a litigant, he does not have standing to assert hypothetical applications to third parties).

In the end, this Court must decide what the crime of gang-member UCW requires the State to prove. If that interpretation will not obviously render the statute unconstitutional, this Court can leave explanations why for another day.

PRAYER FOR RELIEF

The State of Texas prays that the Court of Criminal Appeals reverse the judgment of the court of appeals and affirm Appellant's conviction.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 12th day of August 2021, the State Prosecuting Attorney's Brief on the Merits was served electronically on the parties and amici below.

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